



July 15, 2003

Ms. Christy Brown, RCRA Project Manager  
United States EPA, Region 10  
1200 Sixth Avenue, Mail Stop WCM-126  
Seattle, WA 98101

Subject: **July 15, 2003, Progress Report**  
**J.H. BAXTER ARLINGTON FACILITY**  
**Docket No. RCRA-10-2001-0086**

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Dear Ms. Brown:

This letter provides the July 15, 2003, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from June 15, 2003, to July 15, 2003.

#### Significant Developments This Period

This section discusses significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- On June 23, 2003, Baxter received a letter from U.S. Environmental Protection Agency (EPA), approving the April 10, 2003 – Site Investigation: Supplemental Groundwater Investigation Work Plan. Field work will be conducted in August 2003.
- On June 27, 2003, Baxter submitted a letter to EPA, describing the upcoming ditch sediment excavation which will be performed in conjunction with the Stormwater Improvement Measures construction project. Work will be implemented upon approval from EPA.
- During the weeks of July 7 & 14, 2003, Baxter conducted groundwater sampling in accordance with requirements of the Site Investigation (SI), State Waste Discharge Permit (SWDP), and closed wood waste landfill monitoring program.
- On July 8, 2003, Baxter received a letter from EPA, approving the proposed modifications to the Level III data validation requirements as requested by Baxter.



### **Anticipated Developments Next Period**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to implement elements of the SI Work Plan, including database compilation and data evaluation.

### **Anticipated Problems and Problem Resolution**

This section discusses anticipated problems, and planned resolution of past or anticipated problems.

No new problems or issues have been identified at the facility, other than those mentioned in previous progress reports.

### **Other Information**

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

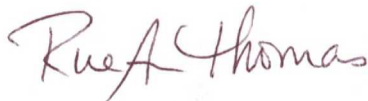
- On June 30, 2003, Baxter submitted 2002 Groundwater Monitoring Reports for North and South Woodwaste Landfills to the Snohomish County Health District.
- On July 2, 2003, Baxter received a confirmation of registration from Washington State Department of Ecology (Ecology), for the infiltration gallery to be used for the disposal of treated stormwater.
- On July 8, 2003, Baxter met with the City of Arlington to discuss the Land-Use Permit requirements and the schedule for stormwater project document submittals and approvals.
- On July 9, 2003 a teleconference was held between Ecology and Baxter to discuss the approval status of the Engineering Report for the stormwater treatment system.
- Baxter will continue excess stormwater treatment in accordance with the approved phased approach for stormwater management.
- Baxter will continue to develop City of Arlington Design and Approval Documents for the proposed stormwater treatment system.

- Baxter will continue with development of the Plans and Specifications for the Stormwater Improvement Measures.

### Certification

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

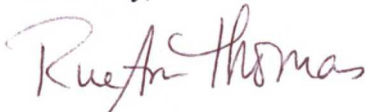
Signature:



Name: RueAnn Thomas  
Title: Environmental Programs Director  
Date: July 14, 2003

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (541) 689-3801.

Sincerely,



RueAnn Thomas  
Environmental Programs Director

cc: Jeanne Tran, Ecology  
Georgia Baxter, J. H. Baxter & Co.  
Mary Larson, J. H. Baxter & Co.  
J. Stephen Barnett, Premier Environmental Services, Inc.